

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
NORTHEASTERN DIVISION**

SONNIE WELLINGTON HEREFORD,)		
IV, <i>et al.</i> ,)		
)	
PLAINTIFFS,)		NO. 5:63-cv-00109-MHH
)	
and)		
)	
UNITED STATES OF AMERICA,)		
)	
)	
PLAINTIFF-INTERVENOR,)		
)	
v.)		
)	
HUNTSVILLE BOARD OF)		
EDUCATION, <i>et al.</i> ,)		
)	
DEFENDANTS.)		

JOINT MOTION FOR LEAVE TO FILE UNDER SEAL

Plaintiff-Intervenor the United States and Defendant Huntsville Board of Education (collectively, the “Parties”) respectfully request leave to file the Parties’ Supplemental Desegregation Advisory Committee (“DAC”) Applicant Rankings and Recommendations and copies of the DAC Applications under seal. In support of this motion the Parties state the following:

1. On November 16, 2016, the Court issued an order amending Section IX of the Consent Order, which contains provisions governing the operations of the DAC. (Doc. 509).
2. The Consent Order, *inter alia*, now requires the Parties to review and rank DAC applications and submit a DAC applicant ranking list to the Court under seal. (Doc. 509, pp. 4-5). The Court will make the final selection of DAC members.
3. On May 2, 2022, the Parties filed the initial applicant ranking list and recommendations for the 2022-2023 DAC. At that time, Huntsville City Schools had not received any student applications from Grissom High School and Lee High School. During the extended application window, Huntsville City Schools received applications from students at Grissom High School and Lee High School. The Parties seek to file their supplemental joint rankings and recommendations for the student applications received from Grissom High School and Lee High School.
4. The Parties seek to file their supplemental joint rankings and recommendations and, for the Court's reference, copies of the DAC applications under seal because these documents contain personally identifiable information ("PII") about students in Huntsville City Schools

that is subject to the Family Educational Rights and Privacy Act (“FERPA”) and its implementing regulations, 34 C.F.R. Part 99.

For the reasons set forth above, the Parties respectfully request that the Court grant this Joint Motion for Leave to File Under Seal.

RESPECTFULLY SUBMITTED this 6 June 2022.

/s/ Christopher M. Pape

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